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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

NOV 09 1983

PE83-11/10/83
PRD980594709

Mr. James La Due
Vice President
CECOS International
2321 Kenmore Avenue
Buffalo, New York 14207

Re: Notice of Deficiency
Ponce Waste Management Facility
EPA ID No. PRD980594709

N.O.D

Dear Mr. La Due:

The Environmental Protection Agency (EPA) has reviewed the Part B permit application submitted subject to the Resource Conservation and Recovery Act (RCRA) and has found the application to be incomplete.

Enclosed are comments prepared by EPA with assistance from Ertec Atlantic, Inc. and the Environmental Quality Board. The information requested must be submitted to EPA by December 16, 1983. A time schedule should be submitted to EPA for information which Cecos believes cannot be submitted by this deadline. The schedule should identify the information needed, a target date, and an explanation of why the information cannot be submitted by the December 16 deadline. The schedule should be submitted to EPA by no later than November 21, 1983.

The EPA expects Cecos to limit the items on the schedule to such things as the liner compatibility test which cannot be physically completed within a 30 day period. EPA will use the schedule to establish reasonable deadlines for this information.

If you submit the required information by the dates established, you shall be notified that your application is complete. If you fail or refuse to correct deficiencies in the application, a RCRA permit may be denied and appropriate enforcement action may be taken under applicable provisions of the Act.

If you have any qauestions regarding this matter, please contact John Jimenez at (212) 264-0547.

Sincerely yours,

Joel Golumbek, Chief
NJ/Caribbean Hazardous Waste Section
Solid Waste Branch

cc: Joe Torlucci
Luis de la Cruz

Enclosure

GENERAL COMMENTS
PONCE WASTE MANAGEMENT FACILITY

Liner Compatibility Test

In the August 1, 1983 memo from J. Kyles to P. Tarnawsky, Cecos presents a proposal to conduct a liner compatibility study at the Niagara Falls facility that would be applicable to the Ponce facility. EPA has already commented on the compatibility study procedures in its review of the Part B permit application for the Niagara Falls facility. The folowing comments are basically the same as those for the Niagara facility with some minor exceptions.

The liner to be tested should be that proposed for the landfill in the Part B (80 mil high density polyethlene).

The use of composite leachate samples from different cells is not acceptable if the leachate from each cell is expected to be significantly different. Leachate samples from individual standpipes should be used. It must be demonstrated that the leachate proposed for the study is representative of the leachate expected to be produced by the individual cells proposed at the Ponce site.

Although not required, Cecos may wish to consider conducting the liner compatability test at room temperature in addition to the elevated temperature specified in Method 9090. This is an amendment currently being considered by EPA and would produce some useful information.

In reference to your proposal to also perform the test with leachate spiked with organics, only the appropriate subcell leachate should be spiked. For example, the organic being used as a spike should be one that would be disposed within the specific liner being tested. Cecos should specify what concentration that final spike will be and the rationale behind setting this concentration.

As a general comment, Cecos should predetermine, as much as possible, how the results will be interpreted. Some suggestions follow:

(a) A comparison of liner materials would be straightforward for each physical parameter. Retention of physical strengths may vary inversely for different materials and confound an overall comparison. Possibly some priority in importance should be given for physical parameters.

(b) Interpretation of the spiked sample results may be difficult. Cecos should anticipate what to do if the results indicate measurable decreases in physical strength parameters. Perhaps Cecos should hypothesize from the results whether the membrane will remain intact under the expected subsurface stresses. This will require two estimates:

1. The strengths after accelerated testing over a few months will have to be extrapolated to those strengths expected under normal conditions up to the end of the post-closure care period.

2. The stresses that will be encountered by the liner until the end of the post-closure care period must be estimated.

Waste Analyses Plan (WAP)

Sampling - (pp. 55 and 56) - The "leaky cup method" for sampling liquids from drums or tankers in Section 2.3.2(a) and the "stake method" Section 2.3.2(b) are unacceptable as they cannot generally produce a representative sample. The success of the former method would depend on a careful matching of the size of the cup, size of a hole, viscosity and density of the liquid, rate of ascension through the liquid column and the rapid emptying of the cup into the sample bottle to obtain a representative sample. We do not believe this can be done in the field. In concord with the methods published in SW-846, 2nd Edition, Section 1.2.1.1, we recommend the use of a Coliwasa-type sampler for liquid samples from drums and tankers.

The solid waste should be sampled with an auger or a large Trier Sampler depending on the waste characteristics.

Test Methods - (pp. C-47 to C-53) - The statement that the Quality Control Laboratory "will rapidly, yet accurately, verify the chemical composition of all waste streams processed at the facility" (Section 2.2) is at variance with the statement made in Section C.2.2(d) that "priority pollutants and other tests requiring sophisticated organic analysis" in "wastewater monitoring, well monitoring and leachate analyses will be performed by a contracted laboratory.....". If a contracted laboratory is employed, PWMF must obtain their methods with the indicated quality control and quality assurance procedures as part of the WAP.

The test methods presented in Table C-6 are confusing and incomplete. The confusion arises from the fact that certain of the parameters presented do not appear to be those considered in the process wastes that will be handled by PWMF. Examples are the dissolved metals, total radium, and gross alpha and beta. Parameters that should be added to the list are the EP toxicity test and related measurements, BOD, COD, settleable solids, and total suspended solids, most of which are critical to evaluating the biological treatment process efficiency. I recommend that more specific references than those presented in Table C-6 be given for each parameter and that appropriate quality control be incorporated into each method. For example, 3 methods are given for chloride for which only 2 are referenced. We request that PWMF state the specific methods that will be used. Also, chlorinated organic compounds are to be analyzed by a gas chromatograph. However, the method reference refers only to the TOX Method 9020 in SW-846, 2nd Editiion. We recommend that PWMF correct Table C-6 and also

bring it into conformance with their waste storage, treatment and disposal processes. A listing of specific laboratory capabilities at PWMF would be helpful in evaluating the WAP.

The ground water monitoring sampling and analysis plan needs to be revised as follows:

Sections E.5.3.1.3 and E.5.4.2 - We consider monitoring wells constructed with PVC piping as proposed in the plan to be undesirable for monitoring organic contaminants in the environment. Plastic material has been shown to sorb non-polar organic substances from water. While we have accepted PVC piping in the past, we recommend the use of clean stainless steel piping for the well. The bailer used to withdraw samples, however, must be made from stainless steel. Section E.5.4.2 states that the PWMF will use the Hack Direct Reading Environmental Laboratory for several on-site analyses. We consider this acceptable if the plan will stipulate that the accuracy of these measurements will be checked daily with standard solutions and the recalibrations will be made when deviation at the level of measurement exceeds 10%.

Table E5-2 - This table does not, but should, describe how volatile organic sample vials will be cleaned. A final drying step is required in this procedure.

Table E5-3 - This table should be revised to include maximum holding times and all known parameters to be encountered in PWMF processes. The table contains several errors. Attached is a copy of EPA's guidance on containers, preservation and holding times. These should be used in revising Table E5-3.

Section E.5.4.3, p.33, paragraph 2 - As part of the preservation requirements, some samples will have to be shipped with ice in the container. This should be stated in this Section of the plan.

Section E.5.4.4, paragraph 1, (p.33) and Table E5-4 - The statement in the first sentence of this paragraph is too general. We recommend that PWMF utilize, whenever possible, the procedures the laboratory will utilize instead of a listing of all EPA recommended procedures. The parameters covered in Table E5-4 should be expended to cover all anticipated parameters, such volatile organics, base/neutral and acid extractable organic priority pollutants and amonia (see Tables E.6-1 to E.6-4).

Other Comments

Refer to attached Report from Ertec Atlantic, Inc.

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<u>Other Comments</u>

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- On May 16, 1983, plans to remedy the interim status violations were submitted by Cecos. These plans were found to be acceptable by EPA. A settlement agreement was signed by EPA, the Mayor of Ponce, and Cecos.

- On August 8, 1983, Cecos submitted the Part B permit application.

The Part B permit application is under review. Prior to any decision, EPA will provide opportunity to all interested parties to comment on the permit application and to provide other information that may be considered pertinent. Failure of the facility to comply with the stringent standards required for a final permit would lead to a termination of interim status and closure of the facility.

In any event, award of a federal permit does not exempt a facility from siting requirements of the government of Puerto Rico.